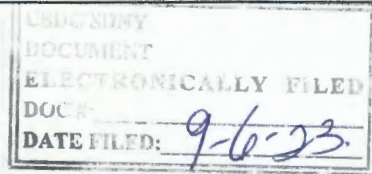




U.S. Department of Justice

United States Attorney
Southern District of New York



The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

September 5, 2023

BY ECF

The Honorable Lewis A. Kaplan
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

**Re: Extension Request for Complete Stay of Discovery,
22 Civ. 3897 (LAK)**

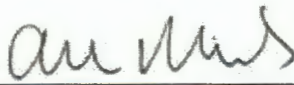
Dear Judge Kaplan:

The Government respectfully writes to request a further 90-day extension of the complete stay of discovery in this case. As noted in previous extension requests, the Government has been engaged in dialogue with counsel to the parties regarding its investigation. The additional time is necessary to continue to review documents obtained from the individual defendants to the civil action and make prosecutive decisions. To the extent additional time is required to resolve these issues, the Government will make a further application to the Court.

The Receiver and defendant Eric Lachow consent to this extension, and the SEC and defendants Michael Castillero, Francine Lanaia, and Brian Martinsen take no position.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: 
Allison Nichols
Assistant United States Attorney
Tel: (212) 637-2366

cc: All counsel of record
Via ECF

SO ORDERED


LEWIS A. KAPLAN, USDI

9/6/23